

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

PAID SEARCH ENGINE TOOLS, LLC

Plaintiff,

v.

GOOGLE, INC. and MICROSOFT
CORPORATION,

Defendants.

CIVIL ACTION NO. 2-08-CV-061

JURY TRIAL DEMANDED

**JOINT MOTION FOR EXTENSION OF TIME
FOR FILING PROTECTIVE ORDER AND SUBMITTING MEDIATOR NAME**

TO THE HONORABLE JUDGE OF THIS COURT:

Plaintiff Paid Search Engine Tools, Inc. (“Plaintiff”) and Defendants Google Inc. and Microsoft Corporation (“Defendants”) file this Joint Motion for Extension of Time for Filing Protective Order and Submitting Mediator Name and respectfully ask the Court to extend two deadlines in this matter. Plaintiff and Defendants respectfully show as follows:

1. In accordance with the Court’s instructions at the October 27, 2008 Scheduling Conference (*See* Dkt. 41), the current deadline for the parties to file a protective order and to submit names for a mediator is November 26, 2008.
2. Plaintiff and Defendants seek an extension of two weeks, through December 10, 2008, to file a protective order and to submit names for a mediator.
3. Plaintiff and Defendants seek these extensions of time not for delay but for good cause and that justice may be served. The parties submit that the requested extension will not delay or interfere with the management of the case or with any other deadlines in the case.

WHEREFORE, Plaintiff and Defendants respectfully request that the Court grant this Joint Motion for Extension of Time for Filing Protective Order and Submitting Mediator Name and extend the deadlines for filing a Protective Order and submitting names for a mediator until December 10, 2008.

Dated: November 24, 2008

Respectfully submitted,

By: /s/ Laura L. Kolb

David T. Pritikin
Richard A. Cederoth
Laura L. Kolb
Sidley Austin LLP
1 South Dearborn Street
Chicago, Illinois 60603
Tel. (312) 853-7000
Fax (312) 853-7036
Email: dpritikin@sidley.com
rcederoth@sidley.com
lkolb@sidley.com

Eric H. Findlay
Brian Craft
Ramey & Flock PC
100 E. Ferguson, Suite 500
Tyler, TX 75702-0629
Tel. (903) 510-5213
Fax (903) 597-2413
E-mail: efindlay@rameyflock.com
bcraft@rameyflock.com

Attorneys for Defendant Microsoft Corp.

By: /s/ David A. Perlson
(signed with permission by Laura L. Kolb)

Charles K. Verhoeven
charlesverhoeven@quinnmanuel.com
David A. Perlson
davidperlson@quinnmanuel.com

Antonio R. Sistos,
antoniosistos@quinnmanuel.com
Emily C. O'Brien
emilyobrien@quinnmanuel.com
QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP
50 California Street, 22nd Floor
San Francisco, California 94111
Telephone: (415) 875 6600
Facsimile: (415) 875 6700

Nicholas H. Patton
SBN: 15631000
nickpatton@texarkanalaaw.com
PATTON, TIDWELL & SCHROEDER, LLP
4605 Texas Boulevard
P. O. Box 5398
Texarkana, Texas 7550505398
(903) 792-7080
(903) 792-8233 (fax)

Attorneys for Defendant Google, Inc.

By: /s/ Elizabeth L. DeRieux
(signed with permission by Laura L. Kolb)

S. Calvin Capshaw
State Bar No. 03783900
Email: ccapshaw@capshawlaw.com
Elizabeth L. DeRieux
State Bar No. 05770585
Email: ederieux@capshawlaw.com
N. Claire Abernathy
State Bar No. 24053063
Email: chenry@capshawlaw.com
Capshaw DeRieux, LLP
1127 Judson Road, Suite 220
Longview, TX 75601
Telephone: (903) 236-9800
Facsimile: (903) 236-8787

Robert M. Parker
Texas Bar No. 15498000
Robert Christopher Bunt
Texas Bar No. 00787165

Charles Ainsworth
Texas Bar No. 00783521
PARKER, BUNT & AINSWORTH, P.C.
100 East Ferguson, Suite 1114
Tyler, Texas 75702
(903) 531-3535
(903) 533-9687 (FAX)

J. Robert Chambers
(Admitted *pro hac vice*)
Email: bchambers@whepatent.com
Wood, Herron & Evans, L.L.P.
2700 Carew Tower
441 Vine Street
Cincinnati, Ohio 45202-2917
Telephone: (513) 241-2324
Facsimile: (513) 241-5960

Gregory M. Utter
(Admitted *pro hac vice*)
Email: gutter@kmklaw.com
W. Jeffrey Sefton
(Admitted *pro hac vice*)
Email: jsefton@kmklaw.com
Keating, Muething & Klekamp, PLL
One East Fourth Street, Suite 1400
Cincinnati, Ohio 45202
Telephone: (513) 579-6400
Facsimile: (513) 579-6457

Attorneys for Plaintiff Paid Search Engine Tools, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Laura L. Kolb
Laura L. Kolb